

UNITED STATES DISTRICT COURT

for the

Eastern District of California

FILED

Nov 28, 2023

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SEALED

In the Matter of the Search of  
INFORMATION ASSOCIATED WITH )  
CYBERTIPLINE REPORTS 130984180, )  
130984197, 130984205, 130984212, and )  
130984214, THAT IS STORED AT )  
PREMISES MAINTAINED BY REDDIT, )  
INC. )

Case No. 2:23-sw-1199 AC

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

SEE ATTACHMENT A, attached hereto and incorporated by reference.

located in the Northern District of California, there is now concealed:

SEE ATTACHMENT B, attached hereto and incorporated by reference

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
18 U.S.C. § 2251  
18 U.S.C. § 2252

Offense Description  
Distribution of Child Pornography  
Possession of Child Pornography

The application is based on these facts:

SEE AFFIDAVIT, attached hereto and incorporated by reference.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice 30 days (give exact ending date if more than 30 days: ) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Matthew Blanco

Applicant's signature

Matthew Blanco, HSI Task Force Officer

Printed name and title

Sworn to before me and signed telephonically.

Date: November 28, 2023

City and state: Sacramento, California

ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT**

I, Matthew Blanco, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND AFFIANT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information that is stored at premises owned, maintained, controlled, or operated by Reddit, Inc., a company headquartered in San Francisco, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A) to require Reddit to disclose to the government records and other information in its possession pertaining to five child exploitation CyberTipline reports made by Reddit and assigned CyberTipline report numbers 130984180, 130984197, 130984205, 130984212, and 130984214 (collectively, the “Subject CyberTipline Reports”).

2. I am a Deputy Sheriff with the Sacramento County Sheriff’s Office, and have been since November 2013. I am cross-designated as a federal task force officer with Homeland Security Investigations (“HSI”). I was sworn as a deputized agent for HSI in June 2022, meaning that I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, a law enforcement officer empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

3. I am presently assigned to the Sacramento Valley Internet Crimes Against Children Task Force where my primary duty is to investigate individuals involved in the online exploitation of minors, including violations of 18 U.S.C. §§ 2251 and 2252. I am a graduate of the Sacramento County Sheriff’s Office Basic Recruit Academy, and received HSI Task Force Officer training in March 2022. I have received hundreds of hours of basic and on-the-job training in the investigation of cases involving the sexual exploitation of children and the use of the internet and computers generally to transmit child pornography. In the course of my employment, I have served or assisted in serving hundreds of search warrants; seized items of computer equipment and digital evidence; and participated in several investigations involving

computer forensics, including investigations related to child pornography and exploitation. I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256, otherwise known as child sexual abuse material or “CSAM”) in all forms of media, including computer media. During my career, I have participated in dozens of investigations of state criminal violations relating to child exploitation and child pornography crimes.

4. The facts set forth in this affidavit are based on my own personal knowledge of this investigation, as well as facts known to fellow law enforcement officers and other individuals that have been communicated to me. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

5. Based on my training and experience and the facts as set forth in this affidavit, I submit that there is probable cause to believe that violations of 18 U.S.C. §§ 2251 and 2252 have been committed by an individual utilizing the Reddit account associated with the email address gqonelove33@gmail.com and the username “alwaysGQ.” I further submit that there is probable cause to search the information described in Attachment A for evidence of these crimes as further described in Attachment B.

6. The Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), (c)(1)(A). Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated.

## **II. FACTS ESTABLISHING PROBABLE CAUSE**

### **A. Summary of Investigation and Requested Search Warrant**

7. Law enforcement agents believe that the owner of the Reddit account associated with the email address gqonelove33@gmail.com used that account to violate federal law by distributing CSAM over Reddit’s direct messaging functionality in August 2022. This belief is based, in part, on the fact that the National Center for Missing and Exploited Children (“NCMEC”) received five CyberTipline reports from Reddit in August 2022, in which Reddit

informed NCMEC that the owner of the Reddit account associated with the email address gqonelove33@gmail.com distributed suspected CSAM to another Reddit user on or around August 15, 2022.

8. The Reddit account associated with the email address gqonelove33@gmail.com contains indicia of being associated with an individual named Michael Taylor. Taylor is presently on supervised release in this judicial district following a conviction for failing to register as a sex offender, in violation of 18 U.S.C. § 2250(a).

9. The warrant for which I am applying would require Reddit to disclose to law enforcement all records, receipts, data files, digital hash values, and other information in Reddit's possession relating to its submission of the Subject CyberTipline Reports to NCMEC, as set forth in more detail in Attachment B. This information is relevant to law enforcement's investigation into Taylor's suspected criminal conduct because it would tend to establish that the CSAM contained in the Subject CyberTipline Reports (as disclosed to law enforcement by NCMEC) is the same bit-for-bit CSAM that Taylor sent to another Reddit user in August 2022 (as disclosed to NCMEC by Reddit).

**B. Background Regarding CyberTipline Reports**

10. NCMEC is a private, nonprofit corporation, incorporated under the laws of the District of Columbia. NCMEC's mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization. NCMEC began operating the CyberTipline on March 9, 1998, in furtherance of its private mission to serve as the national resource center and clearinghouse concerning online child sexual exploitation. The CyberTipline was created to allow persons to report online (and via toll-free telephone) the enticement of children for sexual acts, child sexual molestation, child pornography, child sex tourism, child sex trafficking, unsolicited obscene materials sent to a child, misleading domain names, and misleading words or digital images on the internet.

11. NCMEC has access to certain categories of information about some digital files known to exist on the internet and that consist of CSAM. One category of information to which

NCMEC has access is MD5 hash values associated with CSAM files on the internet. An MD5 hash value is a unique cryptographic computer function that assigns a unique thirty-two-digit alphanumeric value to a digital file.

12. The majority of CyberTipline reports NCMEC receives relate to apparent child pornography and are from electronic service providers (“ESPs”) such as Reddit. Generally, CyberTipline reports submitted to NCMEC by ESPs contain information about suspected CSAM uploaded to or distributed through the ESP’s servers by that ESP’s users or customers. This information can include the date and time of the upload or transmission, the specific product or service used to effectuate the upload or transmission, the Internet Protocol (“IP”) address from which the upload or transmission originated, the suspected account associated with the upload or transmission, identifying information known to the ESP about the suspected account, the name of each uploaded CSAM file involved, unique alphanumeric digital signatures associated with each uploaded CSAM file (the most common of which is the file’s MD5 hash value), and other data.

13. When an ESP submits a CyberTipline report to NCMEC, federal law requires the ESP to retain records and information about the CyberTipline report for at least ninety days. *See* 18 U.S.C. § 2258A(h)(1). Based on my training and experience, I know that some ESPs retain records and information about the CyberTipline reports they submit for longer than ninety days.

**C. Facts Regarding the Subject CyberTipline Reports**

14. On or around August 15, 2022, NCMEC received the Subject CyberTipline Reports from Reddit. I reviewed NCMEC’s summaries of the Subject CyberTipline Reports and conducted further investigation based on some of the information contained in those reports. Based on my review of the Subject CyberTipline Reports themselves, on my own follow-up investigation of those reports, and on my training and experience, I know the following facts:

- a) On or around August 15, 2022, at least five discrete images of suspected CSAM were sent by the Reddit account associated with the email address gqonelove33@gmail.com in a single Reddit chat session to another Reddit user;

- b) The IP address associated with the sending account at the time of these CSAM uploads was 71.193.20.10, which appeared to resolve to the Sacramento area at the time of the uploads;
- c) Employees of Reddit reviewed the contents of the suspected CSAM involved in the Subject CyberTipline Reports and determined that they consisted of CSAM; and
- d) NCMEC personnel did not review the contents of the files uploaded to the Reddit chat, but did indicate that the files likely consisted of CSAM based on a comparison of the unique MD5 hash values of the uploaded images to MD5 hash values of CSAM files known to exist on the internet.

15. After receiving NCMEC's summaries of the Subject CyberTipline Reports, and based on the facts contained in those summaries, investigators on the Sacramento Internet Crimes Against Children Task Force applied for and were granted a warrant to review the suspected CSAM contained in the Subject CyberTipline Reports. This warrant was issued in October 2022 by a judge of the Superior Court of the State of California sitting in the County of Sacramento.

16. Law enforcement officers reviewed the suspected CSAM files that were the subjects of, and contained in, the Subject CyberTipline Reports, and confirmed that the files identified in those reports were, in fact, CSAM. Specifically:

- a) The image file referenced in the CyberTipline Report numbered 130984214 depicted a prepubescent female child laying on her back on a bed. Her vagina, which was underdeveloped and devoid of pubic hair, was exposed and was the focal point of the image. The child appeared to be small in stature, and her body appeared to be lacking in body fat and muscle development, which I know to be consistent with prepubescence.
- b) The image file referenced in the CyberTipline Report numbered 130984180 depicted four prepubescent female children standing next to one another. Each

child's bare breasts and vagina were exposed and were the focal points of the image. The children appeared to be small in stature, and their bodies appeared to be lacking in body fat and muscle development.

- c) The image file referenced in the CyberTipline Report numbered 130984197 depicted a prepubescent female child laying on her back. Her vagina, which was underdeveloped and devoid of pubic hair, was exposed and was the focal point of the image. The child was spreading her vagina open with both of her hands. The child appeared to be small in stature, and her body appeared to be lacking in body fat and muscle development.
- d) The image file referenced in the CyberTipline Report numbered 130984205 depicted two prepubescent female children. One of the children was laying on her back while the other child squatted over her. The first child was orally copulating the second child's vagina. Both children appeared to be lacking in body fat and muscle development.
- e) The image file depicted in the CyberTipline Report numbered 130984212 depicted a prepubescent female child laying on her back on a blanket. The child's legs were spread open and her vagina was the focal point of the image. The child appeared to be small in stature, and her body appeared to be lacking in body fat and muscle development.

### **III. INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

17. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular, 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A), by using the warrant to require Reddit to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

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**IV. CONCLUSION AND SEALING REQUEST**

18. Based on the foregoing, I request that the Court issue the proposed search warrant.

19. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Reddit. Because the warrant will be served on Reddit, which will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.


20. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

Respectfully submitted,

/s/ Matthew Blanco

Matthew Blanco  
Task Force Officer  
Homeland Security Investigations

Subscribed and sworn before me telephonically on: November 28, 2023

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

/s/ SAM STEFANKI

Approved as to form by AUSA SAM STEFANKI



**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the NCMEC CyberTipline reports assigned the following numbers, each of which is stored at premises owned, maintained, controlled, or operated by Reddit, Inc., a company headquartered in San Francisco, California:

1. 130984180;
2. 130984197;
3. 130984205;
4. 130984212; and
5. 130984214.

**ATTACHMENT B**

**Particular Things to be Seized**

**I. Information to be disclosed by Reddit**

To the extent that the information described in Attachment A is within the possession, custody, or control of Reddit, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Reddit, Reddit is required to disclose the following information to the government regarding each of the CyberTipline reports listed in Attachment A:

1. The contents of each CyberTipline report itself;
2. Files containing suspected CSAM that were submitted to NCMEC along each CyberTipline report;
3. Records, receipts, confirmations, and the like relating to each CyberTipline report, Reddit's preparation of each CyberTipline report, and each CyberTipline report's submission to NCMEC;
4. Summaries of information contained in each CyberTipline report; and
5. Communications between Reddit personnel and NCMEC regarding each CyberTipline report.

Reddit is hereby ordered to disclose the above information to the government within ten days of issuance of this warrant.

**II. Information to be seized by the government**

All information described above in Section I that constitutes evidence of violations of 18 U.S.C. §§ 2251 and 2252, including information pertaining to the following matters:

1. Records relating to child sexual abuse material, including chats, images, summaries, and other media depicting, referring to, or reasonably relating to child sexual abuse material;
2. Records relating to any method of identifying files depicting child sexual abuse material, including but not limited to alphanumeric digital signatures associated with any such files;
3. Records indicating how, when, and by whom each CyberTipline report was created and submitted to NCMEC;
4. Records indicating how and when each CyberTipline report was received by NCMEC.

UNITED STATES DISTRICT COURT

for the

Eastern District of California

In the Matter of the Search of )  
INFORMATION ASSOCIATED WITH )  
CYBERTIPLINE REPORTS 130984180, )  
130984197, 130984205, 130984212, and 130984214, )  
THAT IS STORED AT PREMISES MAINTAINED )  
BY REDDIT, INC. )

Case No. 2:23-sw-1199 AC

**SEALED**

**SEARCH AND SEIZURE WARRANT**

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Northern District of California  
(identify the person or describe the property to be searched and give its location):

**SEE ATTACHMENT A, attached hereto and incorporated by reference.**

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

**SEE ATTACHMENT B, attached hereto and incorporated by reference.**

**YOU ARE COMMANDED** to execute this warrant on or before December 12, 2023, (not to exceed 14 days)  
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.


The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to: any authorized U.S. Magistrate Judge in the Eastern District of California.

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for 30 days (not to exceed 30) ☐ until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: November 28, 2023 @ 10:10 a.m.

City and state: Sacramento, California

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

**Return**

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

**Certification**

I swear that this inventory is a true and detailed account of the person or property taken by me on the warrant.

\_\_\_\_\_  
Subscribed, sworn to, and returned before me this date.

\_\_\_\_\_  
Signature of Judge

\_\_\_\_\_  
Date

**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the NCMEC CyberTipline reports assigned the following numbers, each of which is stored at premises owned, maintained, controlled, or operated by Reddit, Inc., a company headquartered in San Francisco, California:

1. 130984180;
2. 130984197;
3. 130984205;
4. 130984212; and
5. 130984214.

**ATTACHMENT B**

**Particular Things to be Seized**

**I. Information to be disclosed by Reddit**

To the extent that the information described in Attachment A is within the possession, custody, or control of Reddit, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Reddit, Reddit is required to disclose the following information to the government regarding each of the CyberTipline reports listed in Attachment A:

1. The contents of each CyberTipline report itself;
2. Files containing suspected CSAM that were submitted to NCMEC along each CyberTipline report;
3. Records, receipts, confirmations, and the like relating to each CyberTipline report, Reddit's preparation of each CyberTipline report, and each CyberTipline report's submission to NCMEC;
4. Summaries of information contained in each CyberTipline report; and
5. Communications between Reddit personnel and NCMEC regarding each CyberTipline report.

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**II. Information to be seized by the government**

All information described above in Section I that constitutes evidence of violations of 18 U.S.C. §§ 2251 and 2252, including information pertaining to the following matters:

1. Records relating to child sexual abuse material, including chats, images, summaries, and other media depicting, referring to, or reasonably relating to child sexual abuse material;
2. Records relating to any method of identifying files depicting child sexual abuse material, including but not limited to alphanumeric digital signatures associated with any such files;
3. Records indicating how, when, and by whom each CyberTipline report was created and submitted to NCMEC;
4. Records indicating how and when each CyberTipline report was received by NCMEC.